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12 Attorneys for Defendant,  
C&H Sugar Company, Inc.

13 UNITED STATES DISTRICT COURT  
14 NORTHERN DISTRICT OF CALIFORNIA  
15

16 SUGAR WORKERS UNION LOCAL NO. 1

17 Plaintiff,

18  
19 C & H SUGAR COMPANY, INC

20 Defendant.  
21

No. C-07-3280 JSW

**[PROPOSED] STIPULATION AND  
ORDER TO DISMISS ENTIRE ACTION  
WITHOUT PREJUDICE**

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23 **STIPULATION**

24 Pursuant to Rule 41(a)(1)(ii) of the Federal Rules of Civil Procedure, Plaintiff Sugar Workers  
25 Union Local No. 1 ("Plaintiff") and C & H Sugar Company, Inc. ("Defendant") by their respective  
26 counsel, hereby stipulate that this action be dismissed without prejudice and that each party bear its own  
27 costs and attorneys' fees.  
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1 Dated: January \_\_\_\_, 2008

**MASTAGNI, HOLSTEDT, AMICK,  
MILLER, JOHNSEN & UHRHAMMER**

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4 By: /s/ Will M. Yamada  
5 WILL M. YAMADA,  
6 KATHLEEN N. MASTAGNI  
7 Attorneys for Plaintiff

8 Dated: January \_\_\_\_, 2008

**SEYFARTH SHAW LLP**

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11 By: /s/ Daniel Newland  
12 G. DANIEL NEWLAND,  
13 JENNIFER SVANFELDT  
14 Attorneys for Defendant

15 **[PROPOSED] ORDER**

16 Based upon the stipulation of the parties and for good cause appearing:

17 **IT IS SO ORDERED.**

18  
19 Dated: January \_\_\_\_, 2008

20 **By:** \_\_\_\_\_  
21 Hon. Jeffrey S. White  
22 United States District Court for the  
23 Northern District of California  
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